

**EXHIBIT A**

**Excerpts from stipulated discovery motion  
Filed in *Anders v. United Airlines, Inc.*  
Case No. 2:19-cv-05809-GW-KS  
(C.D. Cal., Nov. 23, 2020)**

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STEPHANIE ANDERS

**UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

STEPHANIE ANDERS, an individual,  
  
Plaintiff,

v.

UNITED AIRLINES, INC., a  
Delaware corporation; CODY DEAL,  
an individual; and DOES 1-25,  
Inclusive,

Defendants.

Case No: 2:19-cv-5809-GW-KS

**JOINT STIPULATION REGARDING  
PLAINTIFF STEPHANIE ANDERS'  
MOTION TO COMPEL RESPONSES  
TO SPECIAL INTERROGATORIES  
NOS. 23 AND 24 AND REQUESTS  
FOR PRODUCTION OF  
DOCUMENTS NOS. 25 AND 26**

Honorable George H. Wu

Date: December 16, 2020  
Time: 10:00 a.m.  
Crtrm: 9D

Discovery Cut-Off: October 23, 2020  
Pretrial Conference: January 28, 2021  
Jury Trial: February 9, 2021

1 protected from disclosure under 14 C.F.R. §243.9 and requires a protective order. *See*  
2 *e.g. Wallman v. Tower Air, Inc.*, 189 F.R.D. 566 (N.D. Cal. 1999).

3  
4 **SPECIAL INTERROGATORY NO. 24**

5 List all lawsuits filed against YOU (include case name and number) RELATING  
6 TO inflight sexual assault/battery from January 1, 2009 to the present.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 24**

8 United objects to this request on the ground that it is vague, ambiguous, overly  
9 broad and unduly burdensome, and seeks information that is not relevant or reasonably  
10 likely to lead to the discovery of relevant and admissible evidence, to the extent it seeks  
11 “all DOCUMENTS” and covers the period from January 1, 2009 to the present. United  
12 further objects to this request on the ground that the requested passenger information is  
13 protected from disclosure under 14 C.F.R. §243.9 and requires a protective order. *See*  
14 *e.g. Wallman v. Tower Air, Inc.*, 189 F.R.D. 566 (N.D. Cal. 1999).

15  
16 **REQUEST FOR PRODUCTION NO. 25**

17 All COMMUNICATIONS RELATED TO customer complaints of inflight  
18 sexual assaults/batteries from January 1, 2009 to the present.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 25**

20 United objects to this request on the ground that it is vague, ambiguous, and  
21 unduly burdensome with regard to “all communications.” The request also assumes  
22 facts not in evidence, i.e. that there are customer complaints of. . .” United further  
23 objects to this request on the ground that the requested passenger information is  
24 protected from disclosure under 14 C.F.R. §243.9 and requires a protective order. *See*  
25 *e.g. Wallman v. Tower Air, Inc.*, 189 F.R.D. 566 (N.D. Cal. 1999).

1                   **REQUEST FOR PRODUCTION NO. 26**

2           All DOCUMENTS RELATING TO customer complaints of inflight sexual  
3 assaults/batteries from January 1, 2009 to the present.

4                   **RESPONSE TO REQUEST FOR PRODUCTION NO. 26**

5           United objects to this request on the ground that it is vague, ambiguous, overly  
6 broad and unduly burdensome, and seeks information that is not relevant or reasonably  
7 likely to lead to the discovery of relevant and admissible evidence, to the extent it seeks  
8 “all DOCUMENTS” and covers the period from January 1, 2009 to the present. United  
9 further objects to this request on the ground that the requested passenger information is  
10 protected from disclosure under 14 C.F.R. §243.9 and requires a protective order. See  
11 *e.g. Wallman v. Tower Air, Inc.*, 189 F.R.D. 566 (N.D. Cal. 1999).

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13           **III. PLAINTIFF’S ARGUMENT**

14           **A. Ms. Anders’ Preliminary Statement**

15           This case arises from asexual assault that occurred during a United domestic  
16 flight in May 2017. Specifically, on May 31, 2017, while aboard United Flight 815  
17 from Denver to Los Angeles, United passenger, Defendant Cody Deal (“Mr. Deal”),  
18 sexually assaulted Ms. Anders, also a United passenger. During the evening flight, Ms.  
19 Anders awoke to Mr. Deal squeezing and groping her left buttock with this hand. He  
20 had moved the fabric of Ms. Anders’ pants in between Ms. Anders’ buttocks and vagina  
21 and was groping her in between her legs and buttocks. Shocked and humiliated, Ms.  
22 Anders pushed Mr. Deal’s hand away. Seconds later, during light turbulence, Mr. Deal  
23 grabbed Ms. Anders on her upper inner thigh. Again Ms. Anders pushed him away.  
24 She alerted flight staff that Mr. Deal had sexually assaulted her, she did not feel  
25 comfortable seated next to him, and wished to speak with law enforcement upon  
26 landing.